



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



OCT 24 2011

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # S-2918
Project # 1113858

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Crimson Resource Management is proposing a Title V minor permit modification to incorporate the recently issued S-2918-26-3, '27-4 and '28-4 into the Title V operating permit. The change is to add vapor control to three fixed roof storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2918-26-3, '27-4 and '28-4, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



OCT 24 2011

Paul Combs
Crimson Resource Management
5001 California Ave.
Bakersfield, CA 93309

**Re: Notice of Minor Title V Permit Modification
District Facility # S-2918
Project # 1113858**

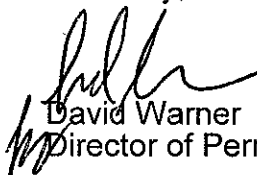
Dear Mr. Combs:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-2918-26-3, '27-4 and '28-4 into the Title V operating permit. The change is to add vapor control to three fixed roof storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-2918-26-3, '27-4 and '28-4, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,


David Warner
Director of Permit Services

Enclosures

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TITLE V APPLICATION REVIEW

Minor Modification

Engineer: David Torii

Reviewing Engineer: Mike Buss

Date:

Michael Buss
10/18/2011

Project #: S-1113858
Facility Number: S-2918
Facility Name: Crimson Resource Management
Mailing Address: 5001 California Ave.
Bakersfeld, CA 93309

Contact Name: Paul Combs
Phone: (661) 716-5001

I. PROPOSAL

Crimson Resource Management (CRM) is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATC) S-2918-26-3, '27-4 and '28-4 into their Title V operating permit.

The ATCs authorized the addition of vapor control to three fixed roof storage tanks.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located at the KCL63 tank battery in the Greely Field, within NW/4 Section 20, Township 29S, Range 26E in CRM's Light Oil Central stationary source.

III. EQUIPMENT DESCRIPTION

ATC Number	Project Number	Description
S-2918-26-3	1104984	MODIFICATION OF 1000 BBL FIXED ROOF WASH TANK #SO 3823 (GREELEY FIELD): INSTALL VAPOR CONTROL SYSTEM SHARED WITH '-27 AND '-28 INCLUDING SEPARATOR, COMPRESSOR AND H2S SCRUBBER DISCHARGING TO THE GREELEY GAS PLANT
S-2918-27-4	1104984	MODIFICATION OF 1000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #SO 3056 (GREELEY FIELD): CONNECT TO VAPOR CONTROL SYSTEM LISTED ON S-2918-26
S-2918-28-4	1104984	MODIFICATION OF 1000 BBL FIXED ROOF PETROLEUM STORAGE TANK (GREELEY FIELD): CONNECT TO VAPOR RECOVERY SYSTEM LISTED ON S-2918-26

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

ATC S-2918-26-3		
Condition	Action	Comment
1	Removed	This condition on ATC S-2918-26-3 required submittal of an application to modify the Title V permit, which has already been satisfied.
3	Removed	This requirement will be incorporated into the PTO S-2918-26-4's Equipment Description

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Proposed PTO S-2918-26-4		
Condition	Action	Comment
2 and 4-8	Added	These conditions on ATC S-2918-26-3 will be included on proposed PTO S-2918-26-4.
1-7	Removed	These conditions on current PTO S-2918-26-1 will not be included on proposed PTO S-2918-26-4

ATC S-2918-27-4		
Condition	Action	Comment
1	Removed	This condition on ATC S-2918-27-4 required submittal of an application to modify the Title V permit, which has already been satisfied.
2	Removed	This requirement will be incorporated into the PTO S-2918-27-5's Equipment Description
8	Removed	This condition on ATC S-2918-27-4 required that ATC S-2918-26-3 be implemented prior to or concurrently with this ATC which will be satisfied

Proposed PTO S-2918-27-5		
Condition	Action	Comment
3-7	Added	These conditions on ATC S-2918-7-4 will be included on proposed PTO S-2918-27-5.
1-7	Removed	These conditions on current PTO S-2918-27-1 will not be included on proposed PTO S-2918-27-5

ATC S-2918-28-4		
Condition	Action	Comment
1	Removed	This condition on ATC S-2918-28-4 required submittal of an application to modify the Title V permit, which has already been satisfied.
2	Removed	This requirement will be incorporated into the PTO S-2918-28-5's Equipment Description
8	Removed	This condition on ATC S-2918-28-5 required that ATC S-2918-26-3 be implemented prior to or concurrently with this ATC which will be satisfied

Proposed PTO S-2918-28-5		
Condition	Action	Comment
2-7	Added	These conditions on ATC S-2918-28-4 will be included on proposed PTO S-2918-28-5.
1-7	Removed	These conditions on current PTO S-2918-28-1 will not be included on proposed PTO S-2918-28-5

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

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3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

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Attachment A

Current Title V Operating Permits

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-26-1

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED ROOF WASH TANK #SO 3823 (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a pressure relief device set to within 10 percent of the maximum working pressure of the tank. [District Rule 4623, 5.4] Federally Enforceable Through Title V Permit
2. Crude oil throughput shall be less than 150 barrels per day. [District Rule 4623, 4.2.2] Federally Enforceable Through Title V Permit
3. Permittee shall maintain monthly records of average daily throughput and shall submit such information to the APCO 30 days prior to annual permit renewal. [District Rule 4623, 6.1.3] Federally Enforceable Through Title V Permit
4. Operator shall keep a record of liquids stored in each container, storage temperature and the Reid vapor pressure of such liquids. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
5. True vapor pressure shall be measured using Reid vapor pressure ASTM Method D323-82 modified by maintaining the hot water bath at storage temperature. Where storage temperature is above 100 degrees F true vapor pressure shall be determined by Reid vapor pressure at 100 degrees F and ARB approved calculations. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
6. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30 deg, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3] Federally Enforceable Through Title V Permit
7. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-27-1

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK #SO 3056 (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a pressure relief device set to within 10 percent of the maximum working pressure of the tank. [District Rule 4623, 5.4] Federally Enforceable Through Title V Permit
2. Crude Oil throughput shall be less than 150 barrels per day. [District Rule 4623, 4.2.2] Federally Enforceable Through Title V Permit
3. Permittee shall maintain monthly records of average daily throughput and shall submit such information to the APCO 30 days prior to annual permit renewal. [District Rule 4623, 6.1.3] Federally Enforceable Through Title V Permit
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7. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-28-1

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

42,000 GALLON FIXED ROOF PETROLEUM STORAGE TANK (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a pressure relief device set to within 10 percent of the maximum working pressure of the tank. [District Rule 4623, 5.4] Federally Enforceable Through Title V Permit
2. Crude oil throughput shall be less than 150 barrels per day. [District Rule 4623, 4.2.2] Federally Enforceable Through Title V Permit
3. Permittee shall maintain monthly records of average daily throughput and shall submit such information to the APCO 30 days prior to annual permit renewal. [District Rule 4623, 6.1.3] Federally Enforceable Through Title V Permit
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6. True vapor pressure of crude oil with an API (American Petroleum Institute) gravity less than 30 deg, as determined by API 2547, may be determined by Headspace Gas Chromatography using the procedures from ARB Evaluation of a Method for Determining Vapor Pressures of Petroleum Mixtures by Headspace Gas Chromatography, October 1990. [District Rule 4623, 6.2.3] Federally Enforceable Through Title V Permit
7. The operator of a fixed roof tank shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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Attachment B
Minor Modifications
(Proposed Title V Operating Permit)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-26-4

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF WASH TANK #SO 3823 WITH VAPOR CONTROL SYSTEM SHARED WITH S-2918-27 AND '28 (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
5. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.72 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: CRIMSON RESOURCE MANAGEMENT
Location: LIGHT OIL CENTRAL STATIONARY SOURCE, KERN COUNTY, CA
S-2918-26-4: Oct 18 2011 8:24AM - TORID

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-27-5

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #SO 3056 SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-2918-26 (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
4. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.13 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: CRIMSON RESOURCE MANAGEMENT

Location: LIGHT OIL CENTRAL STATIONARY SOURCE, KERN COUNTY, CA

S-2918-27-5: Oct 18 2011 8:24AM - TORID

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2918-28-5

EXPIRATION DATE: 06/30/2005

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

1000 BBL FIXED ROOF CRUDE OIL STORAGE TANK SERVED BY VAPOR CONTROL SYSTEM LISTED ON S-2918-26 (GREELEY FIELD)

PERMIT UNIT REQUIREMENTS

1. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
2. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
4. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.13 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Attachment C

Authorities to Construct

ISSUANCE DATE: 04/13/2011

LEGAL OWNER OR OPERATOR: CRIMSON RESOURCE MANAGEMENT**MAILING ADDRESS:**ATTN: ENVIR H & S ENGINEER
5001 CALIFORNIA AVE SUITE #206
BAKERSFIELD, CA 93309**LOCATION:**LIGHT OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA**SECTION:** NW20 **TOWNSHIP:** 29S **RANGE:** 26E**INSPECT PROGRAM PARTICIPANT:** NO**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1000 BBL FIXED ROOF WASH TANK #SO 3823 (GREELEY FIELD): INSTALL VAPOR CONTROL SYSTEM SHARED WITH '27 AND '28 INCLUDING SEPARATOR, COMPRESSOR AND H2S SCRUBBER DISCHARGING TO THE GREELEY GAS PLANT

CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623] Federally Enforceable Through Title V Permit
3. Vapor control system shall serve tanks S-2918-26, '27 and '28. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
7. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.72 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit

INSPECTION
ISSUANCE DATE: 04/13/2011
WORKSHEET

LEGAL OWNER OR OPERATOR: CRIMSON RESOURCE MANAGEMENT

MAILING ADDRESS: ATTN: ENVIR H & S ENGINEER
5001 CALIFORNIA AVE, SUITE #206
BAKERSFIELD, CA 93309

LOCATION: LIGHT OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #SO 3056 (GREELEY FIELD); CONNECT TO VAPOR CONTROL SYSTEM LISTED ON S-2918-26

CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Tank shall vent only to vapor control system listed in S-2918-26. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.13 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. ATC S-2918-26-3 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

INSPECTION
WORKSHEET

ISSUANCE DATE: 04/13/2011

LEGAL OWNER OR OPERATOR: CRIMSON RESOURCE MANAGEMENT

MAILING ADDRESS: ATTN: ENVIR H & S ENGINEER
5001 CALIFORNIA AVE SUITE #206
BAKERSFIELD, CA 93309

LOCATION: LIGHT OIL CENTRAL STATIONARY SOURCE
KERN COUNTY, CA

SECTION: NW20 **TOWNSHIP:** 29S **RANGE:** 26E

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:

MODIFICATION OF 1000 BBL FIXED ROOF PETROLEUM STORAGE TANK (GREELEY FIELD): CONNECT TO VAPOR RECOVERY SYSTEM LISTED ON S-2918-26

CONDITIONS

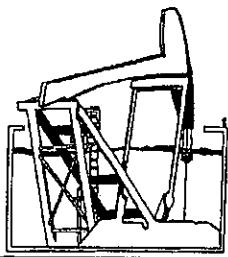
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2. Tank shall vent only to vapor control system listed in S-2918-26. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
3. All piping, valves, and fittings shall be constructed and maintained in a leak free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
4. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
6. VOC fugitive emissions from the components in gas and light oil service on tank and tank vapor control system shall not exceed 0.13 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Permittee shall maintain with the permit accurate fugitive component counts from tank, tank vapor control system and resulting emissions calculated using California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities < 10,000 ppmv screening value ranges emissions factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. ATC S-2918-26-3 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

Attachment C

Emissions Increases

Stationary Source Increase in Permitted Emissions (SSIPE) (lb/yr)				
NOx	SOx	PM10	CO	VOC
0	0	0	0	0

Attachment D
Application



CRIMSON RESOURCE MANAGEMENT

5001 California Ave., Suite 206

Bakersfield, CA 93309

Phone 661-716-5001

Fax 661-716-5008

RECEIVED

AUG 22 2011

SJVAPCD
Southern Region

August 22, 2011

Mr. Leonard Scandura
Permit Services Manager
San Joaquin Valley Unified APCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: Title V Permit Minor Modification: S-2918 KCL63 Vapor Recovery Unit

Dear Mr. Scandura:

Please find enclosed an application for a minor modification to the Title V permit for facility S-2918 submitted in accordance with SJUAPCD Rule 2520.

If you have any questions or need further information, please feel free to call me at (661) 716-5001 or Brian C. Smith at (661) 377-0073 x17.

Sincerely,

Paul J. Combs
Environmental, Health, and Safety Manager

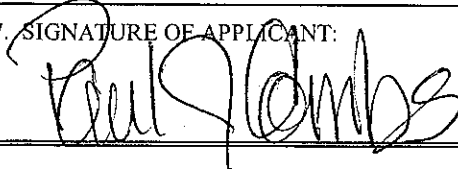
San Joaquin Valley Air Pollution Control District **RECEIVED**
www.valleyair.org

AUG 22 2011

SJVAPCD
Southern Region

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [x] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CRIMSON RESOURCE MANAGEMENT	
2. MAILING ADDRESS: STREET/P.O. BOX: 5001 CALIFORNIA AVE. CITY: BAKERSFIELD STATE: CA 9-DIGIT ZIP CODE: 93309	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: CITY: NW ¼ SECTION 20 TOWNSHIP 29S RANGE 26E	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: CRUDE OIL PRODUCTION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) S-2918-26-3: MODIFICATION OF 1,000BBL FIXED ROOF WASH TANK #SO 3823 (GREELEY FIELD): INSTALL VAPOR CONTROL SYSTEM SHARED WITH '27 AND '28 INCLUDING SEPARATOR, COMPRESSOR AND H2S SCRUBBER DISCHARGING TO THE GREELEY GAS PLANT S-2918-27-4: MODIFICATION OF 1,000 BBL FIXED ROOF CRUDE OIL STORAGE TANK #SO 3056 (GREELEY FIELD): CONNECT TO VAPOR CONTROL SYSTEM LISTED ON S-2918-26 S-2918-28-4: MODIFICATION OF 1,000BBL FIXED ROOF PETROLEUM STORAGE TANK (GREELEY FIELD): CONNECT TO VAPOR RECOVERY SYSTEM LISTED ON S-2918-26	
6. TYPE OR PRINT NAME OF APPLICANT: PAUL J. COMBS	TITLE OF APPLICANT: EHS MANAGER
7. SIGNATURE OF APPLICANT: 	DATE: 8/22/11 PHONE: (661) 716-5001 FAX: (661) 716-5008 EMAIL: pcombs@crimsonbak.com

For APCD Use Only:

Crimson Res Mgmt

DATE STAMP	FILING FEE RECEIVED: \$ 57- CHECK#: 3953
	DATE PAID: 8/22/11
	PROJECT NO: 51113858 FACILITY ID: S-2918

Title V - Minor Mod

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

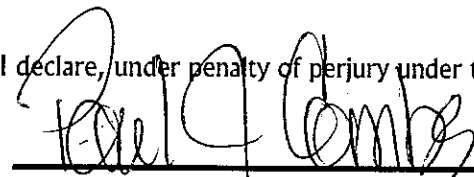
☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: CRIMSON RESOURCE MANAGEMENT	FACILITY ID: S - 2918
1. Type of Organization: <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: GARY BUNTMANN	
3. Agent to the Owner: PAUL J. COMBS	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:



Signature of Responsible Official

8/22/11

Date

PAUL J. COMBS

Name of Responsible Official (please print)

EHS MANAGER

Title of Responsible Official (please print)